

EDWARD P. MANGANO
County Executive



CARNELL T. FOSKEY
County Attorney

COUNTY OF NASSAU
OFFICE OF THE COUNTY ATTORNEY
One West Street
Mineola, New York 11501-4820
516-571-3056
FAX: 516-571-6604
dtauster@nassaucountyny.gov

June 17, 2014

VIA ECF

Magistrate Judge A. Kathleen Tomlinson
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722-9014

RE: *Sedacca, et al. v. Mangano, et al.*, Docket No. 12-cv-1921 (DRH) (AKT)

Dear Magistrate Tomlinson,

I am a Deputy County Attorney in the Office of the Nassau County Attorney, attorneys for Defendants in the above-referenced action. I write to request permission to withdraw, without prejudice, Defendants' currently pending motion to preclude Plaintiffs from deposing County Executive Edward P. Mangano. The parties have reached tentative settlement agreements with Plaintiffs and are currently processing the same, rendering the motion superfluous at this time.

With that said, it is respectfully requested that the conclusion of discovery be stayed or, in the alternative, extended for an additional ninety days. Such a stay or extension will allow both sides to continue processing the settlements while knowing that they will not be left unable to effectively prepare for trial in the unlikely event that the settlements cannot be consummated. Counsel for Plaintiffs has consented to, and joins in, this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David A. Tauster", is written over a horizontal line.

David A. Tauster
Deputy County Attorney

cc: Kenneth L. Gartner, Esq., Lynn, Gartner, Dunne & Covello, LLP
Attorneys for Plaintiffs (via ECF and First Class Mail)